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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY:

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DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

08 CR 2429

WQH

June 2008 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ODILON CIRA-RAMIREZ,

Defendant.

Criminal Case No. _____

I N D I C T M E N T

Title 8, U.S.C.,

Secs. 1324(a)(1)(A)(i)

and (a)(1)(B)(iv) - Bringing in
Illegal Aliens Resulting in Death;

Title 8, U.S.C.

Sec. 1324(a)(1)(A)(i) - Bringing
in Illegal Aliens; Title 8,

U.S.C., Sec. 1324(a)(2)(B)(ii) -
Bringing in Illegal Aliens for

Financial Gain; Title 18, U.S.C.,
Sec. 2 - Aiding and Abetting

The grand jury charges:

Count 1

On or about July 7, 2008, within the Southern District of California, defendant ODILON CIRA-RAMIREZ, with the intent to violate the immigration laws of the United States, did bring, and attempt to bring, to the United States an alien, namely, Cristobal Camal-Chan, knowing that said person was an alien, at a place other than a designated port of entry and at a place other than as designated by the Secretary of the Department of Homeland Security (Title 6, United States Code, Sections 251 and 557), resulting in the death

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1 of the alien; in violation of Title 8, United States Code,
2 Sections 1324(a)(1)(A)(i) and (a)(1)(B)(iv).

3 Count 2

4 On or about July 7, 2008, within the Southern District of
5 California, defendant ODILON CIRA-RAMIREZ, with the intent to violate
6 the immigration laws of the United States, knowing and in reckless
7 disregard of the fact that an alien, namely, Cristobal Camal-Chan, had
8 not received prior official authorization to come to, enter and reside
9 in the United States, did bring to and attempt to bring to the United
10 States said alien for the purpose of commercial advantage and private
11 financial gain; in violation of Title 8, United States Code,
12 Section 1324(a)(2)(B)(ii), and Title 18, United States Code,
13 Section 2.

14 Count 3

15 On or about July 7, 2008, within the Southern District of
16 California, defendant ODILON CIRA-RAMIREZ, with the intent to violate
17 the immigration laws of the United States, did bring, and attempt to
18 bring, to the United States an alien, namely, Juan Antonio Aleman-
19 Recho, knowing that said person was an alien, at a place other than
20 a designated port of entry and at a place other than as designated by
21 the Secretary of the Department of Homeland Security (Title 6, United
22 States Code, Sections 251 and 557), resulting in the death of
23 the alien; in violation of Title 8, United States Code,
24 Sections 1324(a)(1)(A)(i) and (a)(1)(B)(iv).

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Count 4

On or about July 7, 2008, within the Southern District of California, defendant ODILON CIRA-RAMIREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Juan Antonio Aleman-Recho, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 5

On or about July 7, 2008, within the Southern District of California, defendant ODILON CIRA-RAMIREZ, with the intent to violate the immigration laws of the United States, did bring or attempt to the United States an alien, namely, Moises Ramirez-Valdez, knowing that said person was an alien, at a place other than a designated port of entry and at a place other than as designated by the Department of Homeland Security; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i).

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Count 6

On or about July 7, 2008, within the Southern District of California, defendant ODILON CIRA-RAMIREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Moises Ramirez-Valdez, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

DATED: July 23, 2008.

A TRUE BILL:


Foreperson

KAREN P. HEWITT
United States Attorney

By: 
PETER J. MAZZA
Assistant U.S. Attorney